

EXHIBIT A

THE HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JOSEPH J. HESKETH III, on his behalf
and on behalf of other similarly situated
persons,

Plaintiff,

v.

TOTAL RENAL CARE, INC., on its own
behalf and on behalf of other similarly
situated persons,

Defendant.

No. 2:20-cv-01733-JLR

DEFENDANT TOTAL RENAL CARE,
INC.'S RESPONSES TO PLAINTIFF'S
FIRST SET OF INTERROGATORIES

PROPOUNDING PARTY:

PLAINTIFF JOSEPH HESKETH

RESPONDING PARTY:

DEFENDANT TOTAL RENAL CARE, INC.

SET NO.:

ONE

1 **RESPONSE TO INTERROGATORY NO. 3:**

2 Subject to its objections, TRC responds as follows: TRC is a wholly-owned subsidiary of
3 DaVita. Neither TRC nor DaVita utilize a document titled “DaVita Employee Handbook.” To
4 the extent that Interrogatory 3 intends to refer to DaVita’s Teammate Policies, that document is
5 designed to acquaint employees (referred to as “teammates”) with DaVita, to help them become
6 familiar with working at DaVita, and to serve as a resource during their employment. TRC
7 distributes the Teammate Policies document to provide its employees with helpful guidelines and
8 information about its policies, programs, tools, and resources. The Teammate Policies are
9 provided to offer guidance in handling many issues, but the policies contained therein also allow
10 for latitude in their application to individual circumstances or as business needs may warrant.
11 The Teammate Policies are periodically revised and updated.

12 Notwithstanding the above response, TRC objects to this Interrogatory on the grounds
13 that it is unduly burdensome, oppressive, and harassing because it asks TRC to identify every
14 person with “personal knowledge” of the reasons for distributing the Teammate Policies, yet
15 every TRC employee would likely have some level of personal knowledge of the above
16 articulated reasons and certainly any employee in an administrative or management role.
17 Moreover, the request for identification of all documents that TRC contends support or do not
18 support said reason(s) is similarly overly broad. Additionally, discovery and investigation are
19 ongoing, and TRC reserves the right to supplement this response.

20 **INTERROGATORY NO. 4:**

21 Please state each and every reason why and on what authority you include the **DaVita**
22 **Logo** on the paychecks issued to your employees or any other documents used or distributed by
23 you internally, to your employees, any government agency or the public.

24 **RESPONSE TO INTERROGATORY NO. 4:**

25 Subject to its objections, TRC responds as follows: TRC is a wholly-owned subsidiary of
26 DaVita. The DaVita logo appears on each pay slip along with the name of the legal entity under